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Attorney for Defendant  
DAVID HANSEN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
DAVID KENNETH HANSEN,  
Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE  
AND EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT

Date: June 9, 2022  
Time: 9:30 a.m.  
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James  
Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on June 9, 2022. By this  
stipulation, Defendant Hansen moves to continue the status conference to July 28,  
2022.

ORDER CONTINUING STATUS  
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2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government previously provided defense counsel with discovery consisting of written offense reports and audio recordings. Defense counsel thereafter requested the government produce supplemental discovery materials. The defense also shared with the government defense investigation materials as the basis for facilitating settlement discussions. The government recently produced supplemental discovery materials, including hundreds of video recordings, downloaded onto an external hard drive provided by defense counsel. These video recordings are so voluminous that they required computer storage space estimated to be more than two terabytes. Defense counsel is continuing to review these materials with Mr. Hansen.
4. The defense is proceeding with its own investigation in this matter while settlement discussions proceed between the parties. Some of the relevant events in this case occurred near Auburn, California, approximately 35 miles northeast of downtown Sacramento. The defense therefore requests additional time to perform its investigation in the Auburn area. The additional time is needed to follow up on information contained within the supplemental discovery materials mentioned in the preceding paragraph.
5. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to July 28, 2022, at 9:30 a.m., and to exclude time between June 9, 2022, and July 28, 2022, inclusive, under Local Code T-4. The United States does not oppose this request.

- 1 6. Attorney Todd Leras represents and believes that failure to grant additional time as  
2 requested would deny Defendant Hansen the reasonable time necessary for effective  
3 preparation, considering the exercise of due diligence.  
4
- 5 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*  
6 *seq.*, within which trial must commence, the time period of June 9, 2022 to July 28,  
7 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B)  
8 (iv) [Local Code T-4] because it results from a continuance granted by the Court at  
9 Defendant Hansen's request on the basis that the ends of justice served by taking such  
10 action outweigh the best interest of the public and the Defendant in a speedy trial.  
11
- 12 8. Nothing in this stipulation and order shall preclude a finding that other provisions of  
13 the Speedy Trial Act dictate that additional time periods are excludable from the  
14 period within which a trial must commence.

15 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized  
16 Todd Leras via email to sign it on his behalf.  
17

18 DATED: June 6, 2022

PHILLIP A. TALBERT  
United States Attorney

19  
20 By /s/ Todd D. Leras for  
JAMES CONOLLY  
Assistant United States Attorney  
21

22 DATED: June 6, 2022

23 By /s/ Todd D. Leras  
TODD D. LERAS  
Attorney for Defendant  
DAVID HANSEN  
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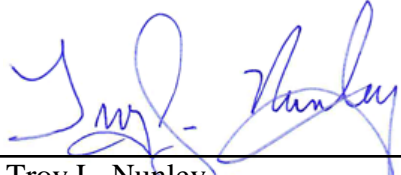
28 ORDER CONTINUING STATUS  
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**ORDER**

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for June 9, 2022, is vacated. A new status conference is scheduled for July 28, 2022, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from June 9, 2022, up to and including July 28, 2022.

IT IS SO ORDERED.

DATED: June 7, 2022

  
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Troy L. Nunley  
United States District Judge

ORDER CONTINUING STATUS  
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